

1 Joseph R. Saveri (*pro hac vice*)  
2 **JOSEPH SAVERI LAW FIRM, INC.**  
3 601 California Street, Suite 1000  
4 San Francisco, CA 94108  
5 Telephone: (415) 500-6800  
6 Facsimile: (415) 395-9940  
7 jsaveri@saverilawfirm.com

8  
9 Richard A. Koffman (*pro hac vice*)  
10 **COHEN MILSTEIN SELLERS & TOLL, PLLC**  
11 1100 New York Ave., N.W., Suite 500, East Tower  
12 Washington, DC 20005  
13 Telephone: (202) 408-4600  
14 Facsimile: (202) 408-4699  
15 rkoffman@cohenmilstein.com

16  
17 Eric L. Cramer (*pro hac vice*)  
18 **BERGER & MONTAGUE, P.C.**  
19 1622 Locust Street  
20 Philadelphia, PA 19103  
21 Telephone: (215) 875-3000  
22 Facsimile: (215) 875-4604  
23 ecramer@bm.net

24  
25 *Co-Lead Counsel for the Classes and*  
*Attorneys for Individual and Representative Plaintiffs*  
26 *Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez,*  
*Brandon Vera, and Kyle Kingsbury*

27  
28 [Additional counsel appear on signature page]

19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
UNITED STATES DISTRICT COURT

19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
DISTRICT OF NEVADA

19  
20  
21  
22  
23  
24  
25  
26  
27  
28 Cung Le, Nathan Quarry, Jon Fitch, Brandon  
Vera, Luis Javier Vazquez, and Kyle  
Kingsbury on behalf of themselves and all  
others similarly situated,

19  
20  
21  
22  
23  
24  
25  
26  
27  
28 Plaintiffs,

19  
20  
21  
22  
23 vs.

24  
25  
26  
27  
28 Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,

24  
25  
26  
27  
28 Defendant.

19  
20  
21  
22  
23  
24  
25  
26  
27  
28 Case No.: 2:15-cv-01045 RFB-(PAL)

19  
20  
21  
22  
23  
24  
25  
26  
27  
28 **PLAINTIFFS' STATEMENT OF  
NON-OPPOSITION TO ZUFFA, LLC'S  
MOTION TO SEAL (ECF-NO. 527)**

1 Zuffa LLC's Motion to Seal Plaintiffs' Motion to Certify Class and Related Materials (ECF No.  
 2 527, the "Motion to Seal") asks the Court to seal documents that have been designated  
 3 CONFIDENTIAL or HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY by Zuffa or third  
 4 parties, and portions of documents that refer to such documents and information, including Plaintiffs'  
 5 Motion to Certify Class (ECF No. 518) and expert reports. Zuffa seeks to seal these documents on the  
 6 basis that they purportedly contain highly confidential and commercially sensitive information. Motion  
 7 to Seal, at 3-5. Plaintiffs take no position at this time as to whether the documents contain highly  
 8 confidential or commercially sensitive information, and do not oppose sealing the documents on the  
 9 limited basis that they have been designated CONFIDENTIAL or HIGHLY CONFIDENTIAL -  
 10 ATTORNEYS' EYES ONLY by Zuffa or third parties pursuant to Section 5 of the Revised Stipulation  
 11 and Protective Order (the "Protective Order"), signed by Magistrate Peggy A. Leen in this litigation on  
 12 February 10, 2016. ECF No. 217. However, Plaintiffs reserve their right to challenge any  
 13 CONFIDENTIAL or HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY designation  
 14 pursuant to Section 6 of the Protective Order.

15 Dated: March 7, 2018

16 Respectfully Submitted,  
 17 JOSEPH SAVERI LAW FIRM, INC.  
 18 By: /s/Kevin E. Rayhill  
 19 Joseph R. Saveri (admitted *pro hac vice*)  
 20 Joshua P. Davis (admitted *pro hac vice*)  
 21 Jiamin Chen (admitted *pro hac vice*)  
 22 Kevin E. Rayhill (admitted *pro hac vice*)  
 23 JOSEPH SAVERI LAW FIRM, INC.  
 24 601 California Street, Suite 1000  
 25 San Francisco, CA 94108  
 26 Phone: (415) 500-6800/Fax: (415) 395-9940  
 27 jsaveri@saverilawfirm.com  
 jdavis@saverilawfirm.com  
 jchen@saverilawfirm.com  
 krayhill@saverilawfirm.com

28 *Co-Lead Counsel for the Classes and Attorneys for  
 29 Individual and Representative Plaintiffs Cung Le, Nathan  
 30 Quarry, Jon Fitch, Luis Javier Vazquez, Brandon Vera,  
 31 and Kyle Kingsbury*

1                   *Additional Co-Lead Counsel for the Classes and Attorneys*  
2                   *for Individual and Representative Plaintiffs Cung Le,*  
3                   *Nathan Quarry, Jon Fitch, Luis Javier Vazquez, Brandon*  
4                   *Vera, and Kyle Kingsbury:*

5                   Benjamin D. Brown (admitted *pro hac vice*)  
6                   Richard A. Koffman (admitted *pro hac vice*)  
7                   COHEN MILSTEIN SELLERS & TOLL, PLLC  
8                   1100 New York Ave., N.W., Suite 500, East Tower  
9                   Washington, DC 20005  
10                  Phone: (202) 408-4600/Fax: (202) 408 4699  
11                  bbrown@cohenmilstein.com  
12                  rkoffman@cohenmilstein.com

13                  Daniel H. Silverman (admitted *pro hac vice*)  
14                  COHEN MILSTEIN SELLERS & TOLL, PLLC  
15                  190 South LaSalle Street, Suite 1705  
16                  Chicago, IL 60603  
17                  Phone (312) 357-0370/Fax (312) 357-0369  
18                  dsilverman@cohenmilstein.com

19                  Eric L. Cramer (admitted *pro hac vice*)  
20                  Michael Dell'Angelo (admitted *pro hac vice*)  
21                  Patrick Madden (admitted *pro hac vice*)  
22                  Mark R. Suter (admitted *pro hac vice*)  
23                  BERGER & MONTAGUE, P.C.  
24                  1622 Locust Street  
25                  Philadelphia, PA 19103  
26                  Phone: (215) 875-3000/Fax: (215) 875-4604  
27                  ecramer@bm.net  
28                  mdellangelo@bm.net  
                     pmadden@bm.net  
                     msuter@bm.net

19                  *Liaison Counsel for the Classes and Attorneys for*  
20                  *Individual and Representative Plaintiffs Cung Le, Nathan*  
21                  *Quarry, Jon Fitch, Luis Javier Vazquez, Brandon Vera,*  
22                  *and Kyle Kingsbury:*

23                  Don Springmeyer  
24                  Nevada Bar No. 1021  
25                  Bradley S. Schrager  
26                  Nevada Bar No. 10217  
27                  WOLF, RIFKIN, SHAPIRO,  
28                  SCHULMAN & RABKIN, LLP  
                     3556 E. Russell Road, Second Floor  
                     Las Vegas, Nevada 89120  
                     (702) 341-5200/Fax: (702) 341-5300  
                     dspringmeyer@wrslawyers.com  
                     bschrager@wrslawyers.com

1                   *Additional Counsel For The Classes:*

2                   Robert C. Maysey (admitted *pro hac vice*)  
3                   Jerome K. Elwell (admitted *pro hac vice*)  
4                   WARNER ANGLE HALLÄM JACKSON &  
5                   FORMANEK PLC  
6                   2555 E. Camelback Road, Suite 800  
Phoenix, AZ 85016  
Phone: (602) 264-7101/Fax: (602) 234-0419  
rmaysey@warnerangle.com  
jelwell@warnerangle.com

7                   Frederick S. Schwartz (admitted *pro hac vice*)  
8                   LAW OFFICE OF FREDERICK S. SCHWARTZ  
9                   15303 Ventura Boulevard, #1040  
Sherman Oaks, CA 91403  
Phone: (818) 986-2407/Fax: (818) 995-4124  
fred@fredschwartzlaw.com

10                  William G. Caldes (admitted *pro hac vice*)  
11                  SPECTOR ROSEMAN KODROFF & WILLIS, P.C.  
12                  1818 Market Street – Suite 2500  
Philadelphia, PA 19103  
Phone: (215) 496-0300/Fax: (215) 496-6611  
wcaldes@srgw-law.com

14                  John D. Radice (admitted *pro hac vice*)  
15                  RADICE LAW FIRM, P.C.  
16                  34 Sunset Blvd.  
Long Beach, NJ 08008  
Phone: (646) 245-8502  
jradice@radicelawfirm.com

**CERTIFICATE OF SERVICE**

I hereby certify that on this 7th day of March, 2018 a true and correct copy of PLAINTIFFS' STATEMENT OF NON-OPPOSITION TO ZUFFA, LLC'S MOTION TO SEAL (ECF-NO. 527) was served via the District of Nevada's ECF system to all counsel of record who have enrolled in the ECF system.

By:

/s/ Kevin E. Rayhill